REMARKS / DISCUSSION OF ISSUES

Claims 1-20 are pending in the application. Claims 6 and 10-20 are newly added; no new matter is added.

The Examiner is respectfully requested to acknowledge the claim for priority and receipt of certified copies of all the priority documents.

The Examiner is respectfully requested to state whether the drawings are acceptable.

Claims are amended for non-statutory reasons: to correct one or more informalities, remove figure label numbers, and/or to replace European-style claim phraseology with American-style claim language. The claims are not narrowed in scope and no new matter is added.

The Office action notes that claim 6 is not found in the application. Claim 6 is newly added herein. No new matter is added.

The Office action rejects claims 1-5 and 7-9 under 35 U.S.C. 103(a) over Dieterich et al. (USP 6,208,643, hereinafter Dieterich) and Miyazama (USP 6,542,518). The applicants respectfully traverse this rejection.

The Examiner's attention is requested to MPEP 2142, wherein it is stated:

> "To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) ***must teach or suggest all the claim limitations***... If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness."

Claim 1, upon which claims 2, 7, and 11 depend, claims a method that includes determining a packet arrival time of each packet of a received sequence of packets, using a packet arrival time counter derived from a local System Time Counter, determining a first Packet Arrival Timestamp of a first information signal packet of the sequence and a second Packet Arrival Timestamp of a first information signal packet that includes a Program Clock Reference value, and determining a

System Time Counter start value by subtracting the number of counts between the first and the second Packet Arrival Timestamps from the Program Clock Reference value.

Dieterich and Miyazama fail to teach determining a System Time Counter start value by subtracting the number of counts between a first information signal packet and second information signal packet that includes a Program Clock Reference value from the Program Clock Reference value.

The Office action asserts that Dieterich teaches determining a System Time Counter start value by subtracting the number of counts between a first information signal packet and second information signal packet that includes a Program Clock Reference value from the Program Clock Reference value at "Column 2 Lines 30+" (Office action, page 3, second paragraph). At this cited text, Dieterich specifically teaches a means for synchronizing the System Time Counter to the Program Clock Reference value, and is silent with regard to determining a start value for the System Time Counter.

Dieterich teaches receiving two PCR-containing packets, subtracting their counts, multiplying this difference by a frequency-correction factor, and *adding* this corrected difference to the System Time Counter to synchronize the System Time Counter to the received PCR value. Dieterich does not teach subtracting a time of the first information packet in a sequence from the first information packet that contains a PCR value, and does not teach subtracting this difference from the PCR-determined System Time Counter to determine a start value for the System Time Counter, as specifically taught and claimed by the applicants.

Because Dieterich fails to teach determining a System Time Counter start value by subtracting the number of counts between a first information signal packet and second information signal packet that includes a Program Clock Reference value from the Program Clock Reference value, the applicants respectfully maintain that the rejection of claims 1, 2, and 7 under 35 U.S.C. 103(a) that relies upon Dieterich for this teaching is unfounded, per MPEP 2142.

Claim 3, upon which claims 4, 8, and 12 depend, claims a method that includes running a packet arrival time counter derived from a local System Time Counter, retrieving information signal packets and a System Time Counter start value from the storage medium, and setting the System Time Counter with the retrieved System Time Counter start value.

Dieterich and Miyazama fail to teach retrieving a System Time Counter start value from the storage medium containing information packets, and setting the System Time Counter with the retrieved System Time Counter start value, and the Office action fails to identify where Dieterich or Miyazama provide this teaching.

Because the Office action fails to identify where the prior art teaches each of the applicants' claimed elements, the applicants respectfully maintain that the Office action fails to produce a prima facie case, and the rejection of claims 3, 4, and 8 under 35 U.S.C. 103(a) over Dieterich and Miyazama is unfounded, per MPEP 2142.

Claim 5, upon which claim 6 depends claims a method that includes subtracting a System Time Counter start value of a second sequence from a value of the Presentation Timestamp of a first information signal packet of the second sequence, and setting a local System Time Counter to the value of the System Time Counter start value.

Dieterich and Miyazama fail to teach subtracting a System Time Counter start value of a second sequence from a value of the Presentation Timestamp of a first information signal packet of the second sequence, and setting a local System Time Counter to the value of the System Time Counter start value, and the Office action fails to identify where Dieterich or Miyazama provide this teaching.

Because the Office action fails to identify where the prior art teaches each of the applicants' claimed elements, the applicants respectfully maintain that the Office action fails to produce a prima facie case, and the rejection of claim 5 under 35 U.S.C. 103(a) over Dieterich and Miyazama is unfounded, per MPEP 2142.

Claim 9, upon which claim 10 depends, claims a method of storing a real time sequence of information signal packets comprising A/V information, including adding mark points at specific entry points in the sequence, and storing the mark point and one or more of the following information entities: Program Clock Reference (PCR) information, Presentation Time Stamp (PTS) information, Decoding Time Stamp (DTS) information, and Packet Identification (PID) mapping information.

The Office action asserts that Dieterich teaches storing a mark point and one or more of the following information entities: Program Clock Reference (PCR) information, Presentation Time Stamp (PTS) information, Decoding Time Stamp (DTS) information, and Packet Identification (PID) mapping information at "Figure 10 as further described in Column 15 Lines 53+ through Column 16, Lines 16-37" (Office action, page 8, lines 2-3). The applicants respectfully disagree with this assertion.

Dieterich teaches a bitstream analyzer for detecting and verifying errors in a bitstream such as inconsistencies of time base and program specific information in real time. Dieterich's FIG. 10 "illustrates a flowchart of a method for measuring conformance of the inter-arrival time for related sections of SI [Service Information] in a real-time system" (Dieterich column 3, lines 21-23). As Dieterich teaches: "the bitstream analyzer processes packets which contain SI information in the transport stream. The processing verifies that successive "sections" from the same group of types (defined below) are not occurring inside of the specified time interval, e.g., within 25 msec of each other" (Dieterich column 4, lines 26-31). FIG. 10, and its description at columns 15 and 16, discloses this time-interval processing and analysis, and does not refer to storing a mark point and information entities, as asserted in the Office action.

Because the figure and text cited by the Office action fails to teach storing a mark point and one or more of the following information entities: Program Clock Reference (PCR) information, Presentation Time Stamp (PTS) information, Decoding Time Stamp (DTS) information, and Packet Identification (PID) mapping information, as claimed by the applicants, the applicants respectfully maintain that the Office

action fails to produce a prima facie case, and the rejection of claim 9 under 35 U.S.C. 103(a) over Dieterich and Miyazama is unfounded, per MPEP 2142.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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